Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
Unlicensed Operation in the TV Broadcast Bands)	ET Docket No. 04-186

COMMENTS OF MICROTUNE, INC.

On March 30, 2007, the Federal Communications Commission ("FCC") released a report titled "Interference Rejection Thresholds of Consumer Digital Television Receivers Available in 2005 and 2006" (OET 07TR-1003). Microtune, Inc. respectfully submits these comments in response to this report.

The report states that none of the tuners tested (all single conversion) meets the ATSC Recommended Guidelines. One should also be concerned that the tested receivers exhibited relatively high susceptibility to interference from channel N+7 at moderate signal levels. This report shows that a number of digital television receivers have difficulty in obtaining reception even in relatively low interference environments.

Fortunately, the National Telecommunications and Information Administration (NTIA) chose to implement minimum performance specifications for their couponeligible converter boxes (CECB) that are similar to the ATSC Recommended Guidelines. The purchase of these converter boxes will be subsidized by a \$40 NTIA coupon upon request. Those who obtain these boxes will have a digital TV receiver with good interference rejection provided that the specifications are properly enforced. The segment of the public with low income that relies on off air broadcast can take advantage

of this and be assured of quality reception.

We propose that tuners in all future digital TVs should be required to have the

same minimum performance specifications as CECB. Any future mobile TV receivers

should also have a minimum performance specification similar to the Mobile and

Portable DVB-T Radio Access Interface Specification (MBRAI) for DVB-H. This will

increase the base of receivers with good interference rejection and allow workable

specifications for unlicensed devices to be established. The public will be served by

getting greater use of this valuable spectrum through intelligent governance of those who

share it.

Respectfully submitted,

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